

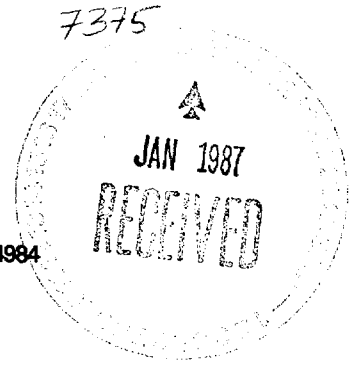


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International Specialists in the Environment



TO : Paula Schmitt diel, EPA
FROM : Henry Schmelzer, E&E
DATE : January 14, 1987
SUBJECT: Comments on Richardson Flats Air Sampling Activities
Report By Muhammed A. Slam, Engineer, Utah Acting Superfund
Program Manager, TDD R8-8605-12 (See Attached Photo Copy).

PAGE 1 The statement that the state of Utah was not contacted regarding this sampling event is false. FIT and EPA members had been in close contact with several state officials and the state had been involved in planning this event from the start. If there is a question that the state was not contacted during the exact sampling dates so that they could be there during the sampling, then there may be some truth to that statement, however it is not really FIT's fault. The FIT was delayed one week in carrying out the air sampling while waiting for ESD approval of the sample plan. The principal state contact person, Wade Hampdon, was aware of the delay but was on vacation the week the sampling took place. There may have been some mix up in Utah involving his replacement during his vacation. FIT would never conduct a sampling event without contacting any appropriate state agency. They are one of the most valuable resources the FIT has gaining background information and local resources. FIT always coordinates its activities with EPA and state agencies.

PAGE 2 The wetlands area is more on the order of three acres than 30 acres. Even so, this information is not of much real value in air sampling and is used in another section of the HRS scoring procedures.

PAGE 3 The sentence should state that the mean monthly high temperature is 80°F. The barometric pressures reported in this section are taken from a climatologic atlas and are corrected to STP. Meteorologic data collected during the sampling is in true barometric pressure and is corrected for altitude in all calculations.

PAGE 4 Sample AM-01 is located southeast of the site. All samplers were located at least 20 feet from the tailings. The reviewer apparently misinterpreted the area on the USGS map labeled as "tailings pond" as being the actual dimensions of the tailings area. This is not the case.

PAGE 5 The state may or may not have been able to provide the appropriate calibrator in time to calibrate the PM-10 sampler. The PM-10 sampler is used to gain additional information on the inhalable fraction of the particulates in the air. Its information is not required for HRS purposes which is the reason why the air sampling was conducted. It is used to get more information for future remedial work. The data base for the sites air pathway for HRS purposes is not reduced if the PM-10 information is not collected.

The high vols were started at staggered intervals since each unit was re-calibrated daily prior to start up. The timers used on the high vols are not all that accurate since they are 7-day mechanical timers with the smallest time division of only 15 minutes. It takes approximately 4 to 5 hours to calibrate 6 samplers. If all samplers were calibrated and then turned on, all would start around 1200 to 1300 hours thus losing important sampling times in the morning when there is wind to stir up the dust from the tailings and adding time during the early evening when winds die down or go calm.

The use of staggered start times or uneven sample periods does not invalidate the data collected. The methods used are to give an indication if the air pathway is being contaminated by the source and if there is being contaminated by the source and if there is the potential for human endangerment. We attempt to sample the largest amount of air volumes during the times of the day when the greatest amount of particulates are generated. We also sample sites that have a good possibility of being a source for air contamination. To date every site where the FIT has done air sampling it has been demonstrated to cause a release of hazardous material to the environment. Consequently, everyone of these sites have scored high enough on the HRS to be recommended for placement on the NPL. The same methodology has been used on all sites.

PAGE 8 The background soil sample taken near the proposed Silver Creek Tailings NPL site was done so inadvertantly. The project officer who was unfamiliar with Utah hazardous waste sites, had no idea that the Prospector Square area was a potential NPL site, especially when the FIT was staying at the hotel there and with all the commercial/residential build up in the area.

The soil samples were taken to confirm or deny a potential problem with lead emissions from motor vehicle exhaust from the roads around the site. The other soil samples taken showed that this was not a problem with the air sampling locations.

The blank filters were shipped separately when the filters were accidentally left in the FIT vehicle in Grand Junction, Colorado. The FIT air sampling team went directly to a site in Grand Junction, Colorado from the Park City area when the Richardson Flat area air sampling was done. The blank filters are always submitted as blind samples. Normally they would be sent with the rest of the samples.

Also note: A sampling activities report does not normally include data interpretation. That information is discussed in a separate Analytical Results Report.